Fairfax County Public Schools (FCPS) would like to thank the FCC for the opportunity to provide comments regarding broadband in K-12 education and suggested changes to the E-Rate program to ensure large scale broadband deployments. Continued funding the E-Rate program at the current level of services is critical to FCPS (and all school districts) to maintain the existing infrastructure and services. Additional E-Rate funding for broadband use and deployment in the K-12 classroom is a critical need in the 21st century.

FCPS has been exceptionally fortunate with forward-thinking administrative leadership and geographical demographics which facilitated deployment of broadband technologies to all schools and administrative buildings. Utilizing a combination of county resources and leased Wide Area Network capacity and E-Rate support, FCPS has been able to serve the needs of teachers, students and administrators.

FCPS asks the Commission to consider expanding the ?State Replacement Contract? regulations to include long procurement cycles for large applicants or applicants beholden to services procured by third parties such as city or county governments. The State Replacement Contract has been an effective means for applicants to secure E-Rate discounted services when contracts could not be awarded by procurement bodies within the structure of the E-Rate filing window.

First, the county will procure all services for this massive undertaking. The procurement cycle will rival that of most states and will be protracted by necessity. The procurement cycle may not comport to the filing window allowed under current E-Rate regulations.

Second, the underlying services will be complex in nature serving the county, schools, and libraries. Under current E-Rate regulations the FCPS, as the billed entity, would be required to file the E-Rate application as a consortium on behalf of both the county schools and libraries. FCPS notes ongoing problems with consortium applications have been addressed to the Commission throughout the years. FCPS supports comments submitted by SECA to streamline and simplify consortium applications. We also ask that clear guidance and flexibility for cost allocation of eligible and ineligible users and services be afforded to consortium leads.

Third, FCPS notes that approximately 25 percent of E-Rate funding routinely goes unused each year. One reason is a relatively complex and unforgiving invoice system with the Administrator. FCPS requests the Commission to provide clear guidance to the Administrator regarding invoice reviews. It is unacceptable that invoices for E-Rate eligible services are ?zero funded? if the invoice has the slightest error. FCPS requests the Commission instruct the Administrator to contact applicants when an error is detected and allow the applicant to correct the error within a reasonable time period ? much like the Bishop Perry or Alaska Gateway Orders addressed other E-Rate forms with similar ministerial errors.

Fairfax County is the largest local jurisdiction in the Commonwealth of Virginia. Fairfax County encompasses approximately 400 square miles with a population in excess of one million residents. FCPS is the twelfth largest school system in the United States with 168,742 students and over 22,000 full time employees. FCPS encompasses 245 schools, learning centers and 35 administrative sites. The Fairfax County Public School Board has established performance expectations for both

academics, in the form of student achievement goals, and operations, in the form of operational expectations.   One of the Student Achievement Goals is to ?Effectively use technology to access, communicate, and apply knowledge and to foster creativity.? FCPS has integrated technology into its classrooms using the following:

1. FCPS eCART - provides curriculum resources and assessment support for grades 1 through 12 for the core curriculum and an increasing number of curriculum areas beyond core. Over the first year of district-wide deployment, more than 1.1 million online and paper and pencil assessments were administered. More than half of the assessments administered last year were teacher created ?private? assessments. These assessments were created either using some of the more than 14,000 items and 340 complete assessments available in eCART or, if preferred, developed from scratch. Teachers use results from these assessments to help identify areas for instructional focus to support individual student growth.

2. FCPS 24-7 Learning is a web-based tool that provides access anywhere, anytime and is used as a single point of access to curriculum, resources, assessment, and professional development and will foster collaboration and sharing of best practices.

FCPS has an exceptional Program of Studies (POS) that has been aligned to the Virginia Standards of Learning. The delivery system for this content is currently found on paper, in electronic documents, proprietary databases, and web pages. FCPS also provides numerous outstanding professional development opportunities to teachers and instructional leaders. Instructional Services will use FCPS 24-7 Learning to:

Provide a single point of access to curriculum, all supporting resources, assessment, and professional development.

? POS and SOL documentation
? Remediation/enhancement materials
? Access to third party applications and external resources
? Catalog of professional development opportunities
? Formative and mastery assessment delivery and reporting

Grow an instructional community that fosters collaboration and sharing of best practices anytime, anywhere.

? Curricular discussion forums
? Real-time electronic conferencing and collaboration (chat, voice, video)
? Customized access (24-7 portal) to FCPS content based on user level or role

3. Virginia Standards of Learning (SOL) On-line testing ? as mandated by the Virginia Department of Education to provide all students an opportunity to take SOL tests online.

4. On-line IEP/SEA-STARS - The Special Education Administrative System for Targeting and

Reporting Success (SEA-STARS) is Fairfax County Public Schools? online Individual Education Plan (IEP) system. Its purpose is to enhance communication and instruction by maintaining student IEPs in electronic format. It also helps to ensure compliance with IEP legal requirements and supports required state and federal reporting.   Teachers are able to input, edit, copy, and save data to a database. The system is designed to store all IEPs and associated documents, thereby creating a comprehensive historical record of a student?s progress throughout his academic tenure within FCPS.

5. Interactive Whiteboards - Interactive whiteboards are used in many schools as replacements for traditional whiteboards or flipcharts or video/media systems such as a DVD player and TV combination. Interactive whiteboards allow teachers to record their instruction as digital video files and post the material for review by students at a later time. This can be a very effective instructional strategy for students who benefit from repetition, who need to see the material presented again, for students who are absent from school, for struggling learners, and for review for examinations. Brief instructional blocks can be recorded for review by students ? they will see the exact presentation that occurred in the classroom with the teacher's audio input. This can help transform learning and instruction.

Additionally, the School Board has established Operation Expectations to monitor how the school system operates. One of the Operational Expectations is: The Superintendent will use technology to support teaching, learning, and the Board's operational expectations and goals.? This goal is monitored and reported upon annually. The following tools are provided and monitored:

1. FCPS Teachers have access to a teacher laptop, presentation workstations, computer lab, wireless mobile labs, and electronic interactive boards.

2. FCPS 24-7 Learning collaboration tools (Wiki?s and Blogs), on-line SOL testing, On-line IEP system, SASI replacement, etc.

3. A new capability has been developed in FCPS 24-7 Learning to allow school administrators to more easily monitor the content and usage of their teachers? sites.

4. In school year 2006-2007, the Online Campus offered 39 courses and served 759 students, an increase over the previous school year.

In closing FCPS would again like to thank the FCC for providing a forum to express current broadband uses in K-12 education and allowing us the opportunity to address E-Rate procedural processes that hinder large scale deployment of broadband in classrooms. It is imperative that E-Rate funding continue for schools as broadband access has become integral to both instruction and accountability.